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Our interest is in you.

March 21, 2006

Robert E. Feldman, Executive Secretary  
Attn: Comments/ Legal ESS  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Dear Mr. Feldman:

As a Lending Officer of the Bank of Canton, I am writing this letter to convey my concern relating to the concentrations in Commercial Real Estate Lending and Sound Risk Management practices as proposed by the four bank regulatory agencies. Establishment of these guidelines, while intended to encourage sound risk management practices for institutions that exceed the prescribed loan to capital guidelines, are likely to become mandates through the examination process.

Despite the fact that our Bank has invested heavily in hiring experienced commercial lenders, construction lenders, qualified support staff and have undertaken ongoing independent loan review, your proposal may force us to reconsider our Bank's strategic plan. This is unfortunate, as the asset quality of our loan portfolio has been strong based upon comments by regulatory examiners and independent loan review specialists. If the intent of these guidelines is to stop lending by banks without the experience level to properly manage the associated risk, I feel confident that the traditional safety and soundness examination process is the best method to assess the risk.

The consequence of these guidelines will not only impact this bank and other banks, but the people and economies of the communities we serve. The economic multiplier affect of sound loans to small builders in Massachusetts is significant. Who will finance these small projects? Your proposed regulation does not distinguish between large projects and small projects.

Where will we deploy these assets, commercial and industrial loans, residential real estate or our investment portfolio? How will that impact our ability to continue to reinvest in people, process and technology?

Ultimately, the application of uniform guidelines throughout the industry may accelerate the ongoing industry consolidation, resulting in banking giants, unresponsive and uncaring to the needs of small borrowers and communities we serve. I ask that you reconsider these proposed guidelines and rely on the safety and soundness exam process to minimize potential risk posed by concentration within the industry.

Sincerely yours,

David S. Tait, Vice President  
Bank of Canton